

4 Q. And that's because your group is smaller?

5 A. That's correct.

6 Q. But for the Stankey organization, it would be
7 broken down?

8 A. I believe so, yes.

9 Q. And the format would be the same as this, have
10 the force and the dollars, labor and nonlabor?

11 A. Basically, yes.

12 Q. Would you mark in dollars on this, labor dollars
13 and nonlabor dollars, and then at the very bottom of the
14 page, you have marked total, and then that would total
15 down for each month?

16 A. Correct.

17 Q. Would there also be a total on the far
18 right-hand side for the end-of-year total?

19 A. That's correct.

20 Q. So should we mark that, too, after December?

21 And the months are separate, not cumulative?

22 A. That's correct.

23 MR. ETTINGER: Can we mark this as an exhibit;
24 that's not proprietary.

25 (Whereupon, Exhibit No. 16 was marked
0103
1 for identification.)

2 MR. ETTINGER: Q. Let me show you a document
3 that's previously been marked as Exhibit 7, which is a --
4 first, I will ask you to look at that document and ask you
5 if you have ever seen that document before.

6 A. No, I don't believe so.

7 Q. Now, next, I will ask you, the first part of
8 that document contains certain estimates of the capacity
9 of the LISC by end of second quarter, third quarter and
10 fourth quarter '97. Do you see that in the document?

11 A. Yes.

12 Q. Have you ever seen those estimates before?

13 A. I've never seen these estimates, these specific
14 estimates.

15 Q. Well, go ahead. Were you going to add
16 something?

17 A. I am not sure where the question was --

18 Q. You have answered my question.

19 A. Okay.

20 MR. KOLTO-WININGER: You don't need to guess
21 what he is asking you. Just go ahead and let him ask his
22 questions.

23 MR. ETTINGER: Q. You have never seen these
24 estimates, either the resale estimates or the unbundled
25 resale estimates; is that your best recollection?

0104

1 A. My recollection, I have seen estimates of order
2 activity for the resale operation, and the total numbers
3 that would appear to be consistent with these estimates on
4 this page. I haven't looked at it in this level -- in
5 this certain category of detail, but they do look
6 familiar.

7 Q. What looks familiar to you?

8 A. The total numbers here, in terms of the --

9 MR. KOLTO-WININGER: Don't use the numbers, if
10 you can.

11 MR. ETTINGER: This is not proprietary.

12 MR. KOLTO-WININGER: Oh, that's right, go ahead.

13 MR. ETTINGER: Q. This is not proprietary, so
14 you can use the numbers.

15 MR. KOLTO-WININGER: If you need to.

16 THE WITNESS: Again, I am going against memory a
17 little bit here, but I know we have a ramp-up of order
18 activity, and the numbers, in particular, the second and
19 third quarter numbers, look like they're consistent with
20 the ballpark of things that I have reviewed in the past.

21 MR. ETTINGER: Q. What I am asking is, the
22 budget that you first established in '96 for '97 had
23 certain assumptions in it as to what the overall capacity
24 of the LISC would be, correct?

25 A. That's correct.

0105

1 Q. And at that time you made your -- when did you
2 do the budgeting?

3 A. The budget was completed in the fourth quarter
4 of '96 for '97.

5 Q. In the fourth quarter of '96, can you be more
6 specific, was it before or after December?

7 A. It was before December.

8 Q. And at that time, Pacific Bell was estimating
9 that the capacity of the LISC would be 2,000 orders per
10 day by the end of January 1997.

11 MR. KOLTO-WININGER: Is that a question?

12 MR. ETTINGER: No, it's not. Let me rephrase
13 that then.

14 Q. I am going to ask you to look at Exhibit 4, a
15 letter from Jerry Sinn to Mary Ann Collier. That says,
16 does it not, that Pacific is estimating that it will be
17 able to raise the capacity of the LISC to 2,000 orders per
18 day in January 1997?

19 A. That's what the letter says.

20 Q. When you were creating the budget, were you
21 aware of that estimate of LISC capacity by the end of
22 January 1997?

23 MR. KOLTO-WININGER: Object. It lacks
24 foundation. But go ahead.

25 THE WITNESS: Not -- again, I don't know when
0106

1 this letter was written. I didn't review the letter. Our
2 forecast was based on the volume expectations at that
3 time, and so based on my recollection of the information,
4 the order activity wasn't that great, the expectation
5 wasn't that great, when we were looking at the numbers in
6 November for January.

7 MR. ETTINGER: Q. Wasn't that great, meaning?

8 A. 2,000, a requirement to do 2,000 orders per day.

9 Q. So when you did the budget before December, it
10 wasn't as high as 2,000, you are saying?

11 A. I don't believe it was, no.

12 Q. I am going to show you a document that's been
13 marked as Exhibit 6, which is a letter from Thomas Moulton

14 to Reed Hundt, the chairman of the FCC.

15 Looking at the last paragraph on the first page,
16 it says, does it not, that as of December 13th, Pacific
17 estimates it will be prepared to handle 2,000 orders a day
18 by end-of-the-year and 4,000 a day by the end of January
19 1997. Do you see that?

20 A. Yes, I do.

21 Q. Were those numbers built into your budget?

22 MR. KOLTO-WININGER: I will object that it lacks
23 foundation. But go ahead and answer.

24 THE WITNESS: No. That letter did not -- the
25 letter was produced after we had created the budget.
0107

1 MR. ETTINGER: Q. Have you ever seen this
2 letter before today?

3 A. No.

4 Q. Did you revise your budget subsequent to
5 creating it in fourth quarter, '96?

6 A. Yes.

7 Q. When was that?

8 A. We updated the budget at least twice in the
9 first quarter of '97, as recent as the last month.

10 Q. You mean March?

11 A. Right.

12 Q. When in March?

13 A. I don't remember specifically. We began to --
14 almost when John Stankey first came a board, we began
15 working with him, again, closely, to rework the numbers
16 based on information to date that -- the productivity

17 estimates, when the systems were going to be available, to
18 make sure that we had the best and current estimate as it
19 relates to the resource requirements that he needed.

20 Q. And is it your testimony that the current
21 integration of the budget is consistent with the estimate
22 of LISC capacity shown in Exhibit 7?

23 A. Who created this page?

24 MR. KOLTO-WININGER: That was produced by us, in
25 response to a data request for our best estimate of volume
0108
1 capacities that we could process in the LISC, so it was
2 produced by an attorney, with input from John Stankey and
3 Jerry Sinn, among others, for our current volume
4 capacities.

5 MR. ETTINGER: Q. With that clarification from
6 counsel, can you answer the question?

7 A. Again, I am not familiar with that specific
8 page, but we are in step with John Stankey's expectations,
9 and if that information is consistent with what John has
10 put out, in terms of activity and force requirements, the
11 answer is -- yes. We work closely with John to make sure
12 that we have the best and current information in our
13 outlook.

14 Q. So then, showing you this page, this indeed is
15 the best estimate of LISC capacity for 1997? This would
16 not cause you to have to redo your budget, this
17 information?

18 A. That's correct.

19 Q. But you personally were not consulted in the
20 preparation of Exhibit 7, I take it?

21 A. That's correct.

22 Q. One final line of questioning.

23 In doing the budget in late '96 for 1997, one of
24 the things you look at is force within LISC, correct?

25 A. Yes.

0109

1 Q. And do you remember what number you used as an
2 estimate of the number of people in the LISC?

3 A. For what point, I'm sorry?

4 Q. For first quarter of '97.

5 A. In terms of the original estimate, in the
6 November time frame?

7 Q. Yes, I am asking you that.

8 A. For the resale operation, I am searching a
9 little bit, but I believe, roughly, it was in the 400
10 person range.

11 Q. Are you aware of a recommendation from Lesley
12 Wood that she made in late '96 that the LISC be staffed in
13 the first quarter of '97 at the range of 700 people?

14 A. No.

15 Q. Where did the 400 number come from that you just
16 referenced? Where did that come from? You did not
17 personally develop that, did you?

18 A. Well, collaboratively with -- based on the
19 volume projection productivity, information resource
20 requirements, based on what we had in the November time
21 frame.

22 Q. Who actually made that calculation?

23 A. It was made between Robert Hough and -- my team
24 and Jerry Sinn's team.

25 Q. The representative from your team was Robert
0110
1 Hough, correct?

2 A. Right.

3 Q. Who was the representative on representatives
4 from Jerry Sinn's team?

5 A. There were a variety of people that were
6 involved. I think at the time, Jeff Phelps, because it
7 was within his scope of responsibility, who works for
8 Jerry Sinn.

9 Q. Would Lesley Wood have been involved?

10 A. She could have been.

11 Q. In addition to forecasting the number of people
12 in the LISC, do you also forecast the number of people,
13 say, in Lesley Wood's group who write M&P's?

14 A. We --

15 Q. I shouldn't say forecast; I should say budget?

16 A. That's correct.

17 Q. So you budget the force requirement?

18 A. Yes.

19 Q. Are you showing any growth in that group through
20 1997?

21 A. I believe we are, yes. We have added -- we
22 continue to add resources to all the local competition
23 teams.

24 Q. Do you add resources to the account teams?

25 A. The account teams, you mean just normally? I am
0111
1 not sure what your question is.

2 Q. When you did Exhibit 16, you listed some names
3 on the left-hand side.

4 A. Right.

5 Q. Heads of organizations within Liz Fetter's
6 industry markets group. I understood that was not an
7 exhaustive list but merely illustrative; is that correct?

8 A. That's correct.

9 Q. Another example of a person that might be listed
10 here might be Janette Corby?

11 A. That's correct.

12 Q. And she is head of the AT&T account team?

13 A. Right.

14 Q. Another person might be Mike Mallen, who is head
15 of the MCI account team?

16 A. That's correct.

17 Q. And you did budgets for those groups as well?

18 A. Yes.

19 Q. Including force?

20 A. Yes.

21 MR. ETtinger: I think we are finished, right on
22 time. That concludes my questions. Thank you.

23 MR. McDONALD: I have nothing further.

24 (Whereupon, the proceedings were adjourned

25 at 12:30 a.m.)
0112

1 CERTIFICATE OF WITNESS

2

3

4

5 I, the undersigned, declare under penalty of
6 perjury that I have read the foregoing transcript, and I
7 have made any corrections, additions, or deletions that I
8 was desirous of making; that the foregoing is a true and
9 correct transcript of my testimony contained therein.

10

11 EXECUTED this day of ,

12 19 , at , .

13

14

15 -----

16 JAIME VILLAGOMEZ

17

18

19

20

21

22

23

24

25

0113

1)

2 STATE OF CALIFORNIA) ss.

3)

4 I, SANDRA L. CARRANZA, the undersigned, a Certified
5 Shorthand Reporter of the State of California, hereby
6 certify that the witness in the foregoing deposition was
7 by me duly sworn to testify to the truth, the whole truth,
8 and nothing but the truth in the within-entitled cause;
9 that said deposition was taken at the time and place
10 therein stated; that the testimony of said witness was
11 reported by me, a Certified Shorthand Reporter, and a
12 disinterested person, and was thereafter transcribed under
13 my direction into typewriting; that the foregoing is a
14 full, complete, and true record of said testimony.
15 I further certify that I am not of counsel or
16 attorney for either or any of the parties in the foregoing
17 deposition and caption named, or in any way interested in
18 the outcome of the cause named in said caption.
19 IN WITNESS WHEREOF, I have hereunto set my hand this
20 day of , 1997.

21 -----
22 SANDRA L. CARRANZA
23 Certified Shorthand Reporter
24 Registered Professional Reporter

25
0114

1 CHAMBERLIN & ASSOCIATES
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5 4/22/97

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9 235 Montgomery Street

Wall

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

In the Matter of)
Illinois Commerce Commission)
)
Investigation concerning Illinois Bell) Docket No. 96-0404
Telephone Company compliance with)
Section 271(c) of the Telecommunications)
Act)

SUPPLEMENTAL TESTIMONY OF
DENNIS WALL
ON BEHALF OF MCI TELECOMMUNICATIONS CORPORATION

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND BY WHOM AND IN
WHAT CAPACITY YOU ARE EMPLOYED.

A. My name is Dennis Wall. I am employed by MCI Telecommunications Corporation
("MCI"). My business address is 205 North Michigan Avenue, Suite 3700, Chicago,
Illinois 60601. I am a Senior Manager in MCI's Northern Carrier Management group
with responsibilities for the Ameritech and NYNEX regions.

Q. PLEASE STATE YOUR PREVIOUS WORK EXPERIENCE IN THE AREA OF
TELECOMMUNICATIONS.

A. I began working for MCI in 1978. I worked as an Operations Technician, Operations Supervisor, Operations Manager, and Sr. Manager over the last 18 years with MCI. I have worked first hand with Ameritech, in particular the operations group.

Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. My major responsibilities are to be the interface between MCI and Ameritech with respect to provisioning performance issues, maintenance performance, billing and collection, access pricing, and customer dial 1 access. I work directly with Ameritech representatives on these issues and seek to achieve a resolution between the companies where there are conflicts.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to introduce a new, common set of baseline ILEC service quality measurements. This baseline represents those measurement elements that are the most critical for measuring ILEC-provided local service capabilities and for promoting true local competition at parity.

Q. WHO DEVELOPED THESE NEW SERVICE QUALITY MEASUREMENTS?

A. The Local Competitive Users Group (LCUG) developed these new service quality measurements. The LCUG is a chartered association whose members include MCI, AT&T, Sprint, Worldcom, LCI and Comptel. This association was formed so that national CLECs can work together to establish common positions on issues of mutual interest. Performance measurements is an area of high interest and importance, since these will be used to determine whether an ILEC -- in this case Ameritech -- is satisfying

its obligation to provide CLECs with nondiscriminatory access to its operational support systems.

An LCUG Service Quality Subcommittee has worked over the last few months to identify and agree to a set of the most important performance measures. The initial document of those agreed-to measurements is attached as Exhibit 1.

Q. WHEN DID LCUG REACH CONSENSUS ON ILEC SERVICE QUALITY PERFORMANCE MEASURES?

A. This CLEC working group reached consensus in early April, 1997.

Q. WHAT PERFORMANCE MEASUREMENTS ARE YOU PROPOSING?

A. We are proposing performance measurements for resale and unbundled network elements for each of the following areas:

Measurement Area:	Key Measure:
preordering	Timeliness of providing pre-order information
ordering/provisioning	Orders completed with specified intervals Order Accuracy Order Status Updates Number of Held Orders
maintenance and repair	Time to Restore (Receipt to Clear duration) Maintenance appointments met Repeat troubles Trouble per 100 lines
billing	Timeliness of billing records delivered Accuracy of records delivered from ILEC to CLEC
customer contact	Operator and Directory Assistance Speed

	of Answer Center Availability
network performance	Network performance parity
unbundled elements	Availability of network elements Performance of network elements
system availability	Support Systems Availability

For each measurement area, we describe the function to be measured, any sub-functions to be measured, the objective of the performance metric, and the proposed service quality measure (SQM) and a minimum performance benchmark. This detail can be found in Exhibit 1.

Q. WHY DOES MCI FIND IT NECESSARY TO REQUEST THESE PERFORMANCE MEASUREMENTS OF AMERITECH?

A. Ameritech proposes to report its performance in very broad and aggregated terms, which do not enable a CLEC to determine whether nondiscriminatory access to operational support systems interfaces is being provided at parity with Ameritech's own retail operations.

Only by providing the additional performance measures as described in Exhibit 1 for both requesting CLECs and Ameritech's own retail operations can a true and unbiased determination be made regarding Ameritech's compliance with its OSS requirements. Otherwise, Ameritech can hide its true performance through narrow and one-sided reporting, as it currently proposes.

Q. WHAT IS THE PURPOSE OF THE SERVICE QUALITY MEASURE (SQM) BENCHMARKS INCLUDED IN EXHIBIT 1?

A. The LCUG working members established the service quality measure benchmarks because ILECs such as Ameritech refused to report its actual performance for these key processes in a manner that allows the CLEC to determine whether parity of service is being provided. The levels of performance depicted in Exhibit 1 represent levels of least acceptable performance, absent any comparative data from Ameritech on which to base these metrics. The Commission should require Ameritech to provide its performance data as detailed in Exhibit 1. This is the only way the Commission can make an independent and fact-based assessment regarding Ameritech's obligation to provide nondiscriminatory access to its operational support systems for all OSS functions. Until Ameritech provides this information, it is premature for the Commission to make any determination regarding Ameritech's OSS readiness and compliance with the competitive checklist.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

ASSUMPTION: OSS FULLY IMPLEMENTED BY ILEC

PRE-ORDER

Function to Be Measured	Sub-Function To Be Measured	Objective of Metric	Proposed SQM
Timeliness of Providing Pre-Order Information		Measures the ILEC response time to a query for appointment scheduling, service & feature availability, address verification, request for phone numbers (TNs) and CSRs. The query interval starts with the request message leaving CLEC and ends with the response message arriving at CLEC	<p>≤ 2 seconds from the time the query is launched until the following data is received back (98% ≤ 2 sec & 100% ≤ 5 sec):</p> <ul style="list-style-type: none"> • Due Date Reservation • Feature Function Availability • Facility Availability • Street Address Validation • Service Availability Information • Appointment Scheduling • Customer Service Records <p>TNs: 30 TNs or less ret'd in ≤ 2 sec 98% of time & ≤ 5 sec 100% of time, > 30 TNs ret'd < 2 hours 100% of time</p>

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

ORDERING/PROVISIONING

Function to Be Measured	Sub-Function To Be Measured	Objective of Metric	Proposed SQM
Orders completed within specified intervals		Measures the percentage of orders (installation feature change, service disconnect) completed equal to or less than the requested due date that is equal or greater than the interval specified in the Service Quality Measurements column.	<p>Unless specified below, orders with no Premise Visit or physical work completed within 1 day of service order receipt*; orders that require Premise Visit: completed within 3 days of service order receipt*; 99% installation appointments met*.</p> <p>Installation</p> <ul style="list-style-type: none"> • UNE Platform (at least DS0 loop + local switch + all common elements) always w/i 24 hours, regardless of dispatch • UNE Channelized DS1 (DS1 loop + multiplexing always w/i 48 hours • Unbundled DS0 loop always w/i 24 hours • Unbundled DS1 loop (unchannelized) always w/i 24 hours • Other Unbundled Loops always w/i 24 hours • Unbundled Switch always w/i 48 hours • Dedicated Transport - DS0/DS1 always w/i 3 business days • Dedicated Transport - DS3 always w/i 5 bus days • Shared transport - always w/i 3 business days

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

* Reported for the following types of service or facility: Resold POTS, Resold ISDN, Resold Centrex/Centrex-like, Resold PBX trunks, Resold Channelized T1.5 Service, Other Resold Services, UNE Platform (at least DS0 loop + local switch + common elements), UNE Channelized DS1 (DS1 loop + multiplexing), Unbundled DS0 loop, Unbundled DS1 loop, Other Unbundled loops, Unbundled Switch, Other UNEs.

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

ORDERING/PROVISIONING

Function to Be Measured	Sub-Function To Be Measured	Objective of Metric	Proposed SQM
			Feature Changes <ul style="list-style-type: none"> Any order completed ≤ 5 business hours of receipt Disconnects: <ul style="list-style-type: none"> Resale Product or Service Disconnects always w/i 24 hours UNE switching w/i 24 hours UNE (other) w/i 24 hours
Order Accuracy	% Of Completed Orders Without Error For UNE And Resale	Tracks the accuracy, completeness and quality of implementing & disconnecting service as specified on the order	99% Without Error
Order Status Updates	<ul style="list-style-type: none"> Resale Unbundled Network Elements Designed Services Links 	Tracks the timeliness of receiving Firm Order Confirmation, Jeopardies, Rejects, Revised Due Dates, Order Completion information against the standard due date	100% ≤ 4 hours Jeopardies/revised due date: ≤ 4 hours Rejects: ≥ 97% in < 15 seconds Order Completions: ≥ 97% rec'd w/i 30 min of order completion
Number of Held Orders		Tracks the number and percent of held orders within specified intervals against total orders	report for: ≥ 15 days < 0.01% ≥ 90 days, =0%

* Reported for the following types of service or facility: Resold POTS, Resold ISDN, Resold Centrex/Centrex-like, Resold PBX trunks, Resold Channelized T1.5 Service, Other Resold Services, UNE Platform (at least DS0 loop + local switch + common elements), UNE Channelized DS1 (DS1 loop + multiplexing), Unbundled DS0 loop, Unbundled DS1 loop, Other Unbundled loops, Unbundled Switch, Other UNEs.

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

MAINTENANCE AND REPAIR

Function to Be Measured	Sub-Function To Be Measured	Objective of Metric	Proposed SQM
Time to Restore (Receipt to Clear Duration)	Time to restore measures kept by following categories: Resale POTS BRI DSO DS1 and above UNE (Requires establishment of standard restoral intervals)	Measures average duration in hours (or fraction thereof) of all trouble reports from receipt to resolution of trouble ticket. (Average Dispatch) - Troubles where dispatch required - Troubles where no dispatch required	Out of Service Dispatch Required 90% ≤ 4 hrs 95% ≤ 8 hrs 99% ≤ 16 hrs No Dispatch Required 85% ≤ 2 hrs 95% ≤ 3 hrs 99% ≤ 4 hrs All Other Troubles 95% ≤ 24 hrs Meantime to restore reported for ILEC and CLEC
Maintenance Appt. Met (Repair Appts not missed)		Measures the compliance of restoring service within the time estimated to the customer, reported for premises visits required and premises visit not required.*	≥ 99%
Repeat Troubles		Measures the frequency of recurring customer trouble on the same line, circuit, or service	≤ 1% within 60 days
Trouble per 100	Measures the frequency of troubles reported within the ILEC's network* • Access Lines • Unbundled Loops	Measures the frequency of troubles reported within the ILEC's network	≤ 1.5 per month

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

RECORDED USAGE AND WHOLESALE BILLING RECORDS

Function to Be Measured	Sub-Function To Be Measured	Objective of Metric	Proposed SQM
Timeliness of Billing Records Delivered		Measures the timeliness of customer billing records, access records and wholesale bills (usage, CSRs, service orders, time & materials, adjustments) delivered to CLEC	99.99% customer billing and access records received in ≤ 24 hours; 100% customer billing records rec'd in ≤ 48 hours; $\geq 99.95\%$ wholesale bills rec'd w/in 10 calendar days of bill date
Accuracy of records delivered from ILEC to CLEC		Measures the percentage of wholesale bills or customer billing or Carrier billing records delivered to CLEC in the agreed-upon format and with the complete agreed-upon content (includes time and material and other non-recurring charges)	99.99% of all records transmitted 98% wholesale bill financially accurate

CUSTOMER CONTACT

Function to Be Measured	Sub-Function To Be Measured	Objective of Metric	Proposed SQM
Operator and Directory Assistance Speed of Answer		Measures the % of time a call is answered by an operator in a specified timeframe	Live $90\% \leq 10$ sec Mechanized $100\% < 2$ sec
Center Availability		Measures the time for the ILEC representative to answer business office calls in LISC and Trouble Report Centers.	$\geq 95\%$ within 20 seconds 100% within 30 seconds

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

Reported for the following types of service or facility: Resold POTS, Resold ISDN, Resold Centrex/Centrex-like, Resold Channelized T1.5 Service, Other Resold Services, UNE Platform (at least DS0 loop + local switch + transport elements), UNE Channelized DS1 (DS1 + loop + multiplexing), Unbundled DS0 loop, Unbundled DS1 loop, other Unbundled loops, Unbundled Switch, Other UNEs

LCUG SERVICE QUALITY MEASUREMENTS (SQMs)

NETWORK PERFORMANCE

Function to Be Measured	Sub-Function To Be Measured	Objective of Metric	Proposed SQM
Network Performance	Network Performance Parity	Compares ILEC performance for its own customers to ILEC performance for CLEC. Measures the deviation from supplier service performance distribution.	Deviation $\leq 0.10\%$ from supplier service performance distribution: Transmission quality: <ul style="list-style-type: none"> • Subscriber Loop Loss • Signal to Noise Ratio • Idle Channel Circuit Noise • Loops-Circuit Balance • Circuit Notched Noise • Attenuation Distortion • Fax Transactions 9.6 kbps Speed of Connection: <ul style="list-style-type: none"> • Dial Tone Delay • Post Dial Delay Call Completion: <ul style="list-style-type: none"> • Call delivery rate Reliability Requirements (Call Blockage) <ul style="list-style-type: none"> • Network incidents affecting > 5000 blocked calls • Network incidents > 100,000 blocked calls